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AUG -2 2024 *Ly*

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities Commission

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

* *All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**EXHIBITS TO SUPPORT MOTION
OF WILLIAM B. ABRAMS
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004
FOR ENTRY OF AN ORDER
AUTHORIZING DISCOVERY AND
TRUST COMPLIANCE WITH
COURT ORDERS**

Related Documents: Dkt. 14474, 14529,
14530, 14475, 14507, 14483, 14484,
14504, 14511, 14523, 14524, 14527,
14531, 14543, 14551, 14481, 14512,
14554

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PRELIMINARY STATEMENT

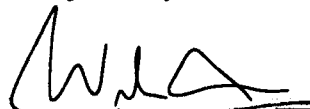
William B. Abrams (“**Abrams**”) as a Pro Se Claimant, hereby submits the *Exhibits to Support Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an Order Authorizing Discovery and Trust Compliance with Court Orders* (the “**Exhibits**”) pursuant to Federal Rule of Bankruptcy Procedure 2004 and Local Bankruptcy Rule 2004-1(a) and in response to the July 30, 2024 email instructions from the Court to “...*file the exhibits you referred to during this morning’s hearing. No additional briefing should be included.*”

As requested by the Court, Abrams has attached certain exhibits that he referenced and planned to present during the July 30, 2024 hearing. Abrams also feels compelled to mention to the Court that certain other documents and communications were presented to Abrams but were not referred to within the hearing and are nonetheless relevant to this discovery motion. These documents will not be released by Abrams until such time as the parties that provided these documents give Abrams permission to do so. The Court should be aware that PG&E victims are concerned about receiving the types of attacks and threats that Abrams has received within this case if they release documents to support this Motion and are additionally concerned about the legal implications of sharing documents with the Court given the waivers and releases for which they were forced to sign as a prerequisite to be compensated through the Fire Victim Trust. Still other parties associated with the Fire Victim Trust and core parties within this case are bound by “confidentiality protocols” and nondisclosure terms that prevent their engagement within these matters. Abrams, with an abundance of caution, shares this information so that the Court is aware of what documents were and were not included as exhibits herein. Additionally, the Court should understand that Abrams stands ready to defend himself against the false statements and ad hominem attacks lodged against him by the Trustee and the Trust Oversight Committee Members including through their Response to the Motion [Dkt. 14529].

If the Court approves the full panoply of 2004 discovery rights requested through the Motion, Abrams will exercise those rights including but not limited to (1) oral depositions pursuant to FRBP 7030 (2) interrogatories pursuant to FRBP 7033 (3) requests for admissions pursuant to FRBP 7034 and (4) subpoena authority pursuant to FRBP 9016. Additionally, Abrams as a pro per, would welcome the Court’s appointment of an independent examiner to understand the degree to which certain parties violated bankruptcy law and acted in ways adverse to the interests of the estate and Fire Victim Trust beneficiaries. In accordance with the email directives of the Court, Abrams respectfully submits the included exhibits demonstrating further good cause for 2004 discovery and will not provide additional briefing.

Dated: August 1, 2024

Respectfully submitted,



William B. Abrams
Pro Se Claimant

TABLE OF EXHIBITS

Exhibit A: List of Applicable Laws and Provisions

- 11 U.S. Code Section 1103, 330(a)(7), 326(d), 327(a), 328(c)
- FRBP 2016
- FVT Trust Agreement Section 6.2, 2.1(b), 2.2(f)(vi), 1.2

Exhibit B: Recent Letters from Gerald Singleton Esq., Trust Oversight Committee

- **Exhibit B1: 4/29/2024 Letter:** Settlement Description *"200M... 1.4% value of the Trust... will not be disbursed until after all FVT claims... we believed that the result of the settlement... would go into the FVT to all plaintiffs on a pro rata basis... the result was slightly different... as a reminder, this settlement is confidential and, as such we must remind you not to discuss this settlement with anyone that is not your attorney."*
- **Exhibit B2: 5/6/2024 Letter:** *"We are excited to announce a new coalition Fairness to Fire Victims... our firm has been working with legislators and other political representatives to amend AB1054... Our firm is working to change this and has proposed legislation that would enable the FVT and PG&E to utilize these funds to ensure victims receive the remaining 30% needed to make them whole."*

Exhibit C: Documentary Evidence regarding Derivative Cases

- **Exhibit C1: "Notice of Submission of Coordination", January 28, 2021, Case No. CGC-21-589441 (after 6/19/2020 when cases assigned to FVT [Dkt. 8048])**
 - Michael Kelly, TOC Member and "Individual Plaintiffs' Lead Counsel"
 - Frank Pitre, TOC Member and "Individual Plaintiffs' Lead Counsel"
 - Bill Robins III, TOC Member and "Individual Plaintiffs' Lead Counsel"
 - Steven Skikos, TOC Member and "Individual Plaintiffs' Liaison Counsel"
 - Elizabeth Cabraser, TOC Member and "Class Action Committee Chair"
 - Gerald Singleton, TOC Member and "Individual Plaintiffs Steering Committee"
 - Michael Kelly, TOC Member and "Attorneys for Petitioner John K. Trotter Jr., Trustee of the PG&E Fire Victim Trust"
- **Exhibit C2: Substitution of Attorney** ("Former Legal Representative" Mr. Singleton, TOC Member and "New Legal Representative" Mr. Robins TOC Member), Case# JCCP No. 4955; CGC-17-562192
- **Exhibit C3: Osmose Settlement Notice Excerpt [Dkt. 14515]:** Executed by Cathy Yanni, Trustee and Gerald Singleton Representing the Abram Plaintiffs (Additional Policy Limits Settlement)